



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 15, 2024

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1305
New York, NY 10007

Re: *The Intercept Media, Inc., et al., v. National Park Service, et al.*,
23 Civ. 10922 (PAE)

Dear Judge Engelmayer:

We write jointly on behalf of Plaintiffs The Intercept Media, Inc., publisher of The Intercept, and Ryan Devereaux (collectively, "Plaintiffs"), and Defendants the National Park Service ("NPS") and the Department of the Interior (collectively, "Defendants" or the "Government," and together with Plaintiffs, the "Parties") in the above referenced Freedom of Information Act ("FOIA") matter in accordance with the Court's February 16, 2024 Order, ECF No. 19.

On March 15, 2024, the Government provided a draft *Vaughn* index to Plaintiffs. The Parties subsequently exchanged email communications attempting to narrow and/or resolve the matters in dispute. However, they were unable to reach agreement. Accordingly, issues remain in dispute that require resolution by the Court.

The Parties jointly propose the following schedule for summary judgment briefing.

May 17, 2024 – Government brief due
June 14, 2024 – Plaintiffs' opposition brief due
June 28, 2024 – Government reply brief due

Thank you for your consideration of this matter.

Respectfully,


DAMIAN WILLIAMS
United States Attorney

By: /s/ Dominika Tarczynska
DOMINIKA TARCZYNSKA
Assistant United States Attorneys
Tel. (212) 637-2748
Fax (212) 637-2686
dominika.tarczynska@usdoj.gov
Attorney for Defendant

The Court thanks the parties for this status update. The Court endorses the parties' proposed briefing schedule.

SO ORDERED.

Dated: April 16, 2024
New York, New York



PAUL A. ENGELMAYER
United States District Judge